THE OFFICE OF REGULATORY STAFF DIRECT TESTIMONY & EXHIBITS

OF

IVANA C. GEARHEART

APRIL 14, 2015



DOCKET NO. 2014-406-S

Application of Development Service, Incorporated for Approval of Sewer Rates, Terms and Conditions

Page 1 of 8

1		DIRECT TESTIMONY OF
2		IVANA C. GEARHEART
3		ON BEHALF OF
4		THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
5		DOCKET NO. 2014-406-S
6		IN RE: APPLICATION OF DEVELOPMENT SERVICE, INCORPORATED
7		FOR APPROVAL OF SEWER RATES, TERMS AND CONDITIONS
8		
9	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.
10	A.	My name is Ivana Gearheart. My business address is 1401 Main Street, Suite
11		900, Columbia, South Carolina, 29201. I am employed by the South Carolina Office of
12		Regulatory Staff ("ORS") as an Audit Manager.
13	Q.	PLEASE STATE YOUR EDUCATIONAL BACKGROUND AND EXPERIENCE.
14	A.	I received a Master's Degree in Business Administration with an emphasis in
15		Accounting from Winthrop University in 2006. Prior to joining ORS, I held a variety of
16		positions in finance, accounting, and auditing. I began my employment as an auditor
17		with ORS in June 2011 and have participated in various audits of utility companies,
18		which include water and wastewater rate cases. I was promoted to the water and
19		wastewater manager in 2014 and have previously testified before the Public Service
20		Commission of South Carolina ("Commission").
21	Q.	WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?
22	A.	The purpose of my testimony is to set forth my findings and recommendations
23		resulting from ORS's examination of the Application of Development Service, Inc. ("DSI"

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Page 2 of 8

1	or "Company") in this docket, 2014-406-S. The application was filed on December 31,
2	2014.

3 Q. PLEASE DESCRIBE THE PROCEDURES USED TO PERFORM THE 4 EXAMINATION OF THE APPLICATION OF DEVELOPMENT SERVICE, INC.

A. ORS's examination of the Company's Application for Approval of Sewer Rates, Terms and Conditions ("Application") consisted of three major steps. In step one, ORS verified that the operating experience, reported by DSI in its Application, was supported by DSI's accounting books and records for the twelve months ended December 31, 2013 ("test year"). In the second step, ORS tested the underlying transactions in the books and records for the test year to ensure that the transactions were adequately supported, had a stated business purpose, were allowable for ratemaking purposes, and were properly recorded. Lastly, ORS's examination consisted of adjusting, as necessary, the revenues, expenditures, and capital investments to normalize the Company's operating experience and operating margin, in accordance with generally accepted regulatory principles and prior Commission orders.

16 Q. PLEASE IDENTIFY THE EXHIBITS ATTACHED TO YOUR TESTIMONY.

- 17 A. I have attached the following exhibits to my testimony relating to the Application:
- Audit Exhibit ICG-1: Operating Experience & Operating Margin
- Audit Exhibit ICG-2: Explanation of Accounting and Pro Forma Adjustments
- Audit Exhibit ICG-3: Computation of Depreciation Expense
- Audit Exhibit ICG-4: Computation of Income Taxes
- These exhibits were either prepared by me or were prepared under my direction and
- supervision in compliance with recognized accounting and regulatory procedures for

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Page 3 of 8

1		wastewater utility rate cases. These exhibits show various aspects of DSI's operations
2		and financial position.
3	Q.	PLEASE DESCRIBE THE FORMAT OF AUDIT EXHIBIT ICG-1 AND
4		ELABORATE ON THE CALCULATIONS.
5	A.	Audit Exhibit ICG-1 details DSI's operating experience and operating margin for
6		wastewater operations for the test year. The exhibit's format is designed to reflect DSI's
7		Application per books amounts and ORS's proposed accounting and pro forma adjustments
8		necessary to normalize the results of DSI's test year operations, and to calculate the impact
9		of the proposed increase on the normalized test year.
10		Column (1) details the Application's per books amounts reported by DSI for the test year.
11		ORS verified total operating revenues of \$527,580, total utility operating expenses of
12		\$493,943 and net loss for margin of (\$9,533) to the Company's books and records. The per
13		books negative operating margin of -1.81% was calculated by using total operating income,
14		less interest expense, divided by total operating revenues.
15		Column (2) details ORS's proposed accounting and pro forma adjustments designed to
16		normalize DSI's Application per books. An explanation of each adjustment is contained in
17		Audit Exhibit ICG-2.
18		Column (3) details ORS's calculation of a normalized test year for DSI by adding columns
19		(1) and (2). After the accounting and pro forma adjustments, net income for margin of
20		\$2,197 was computed using total operating revenues of \$553,640, less total utility
21		operating expenses of \$513,939, less interest expense of \$37,504. An operating margin of

0.40% was computed by dividing net income for margin by total operating revenues.

Page 4 of 8

1		Column (4) details the proposed increase, the calculation of bad debt expense, and taxes
2		associated with the proposed increase. An explanation of each adjustment is contained in
3		Audit Exhibit ICG-2.
4		Column (5) details the effect of the applicant's proposed increase by adding columns (3)
5		and (4). Net income for margin of \$175,290 was computed using total operating revenues
6		of \$839,786, less total utility operating expenses of \$626,992 and less net interest expense
7		of \$37,504. An operating margin of 20.87% was computed by dividing net income for
8		margin by total operating revenues.
9	Q.	PLEASE EXPLAIN THE ADJUSTMENTS IN AUDIT EXHIBIT ICG-2.
10	Α.	For comparative purposes, ORS's and DSI's proposed adjustments are both
11		presented in Audit Exhibit ICG-2.
12		Adjustments 1, 2, 3 and 4 - Operating Revenue - In order to normalize operating revenues,
13		the ORS Water and Wastewater Department proposes to adjust wastewater revenues by
14		\$164,069 for residential customers, (\$155,674) for commercial customers, \$2,819 for late
15		fees and \$14,846 for Miscellaneous revenue during the test year. These adjustments were
16		provided by ORS witness Willie Morgan.
17		Adjustment 5 – Operating Expenses:
18		ORS's operating expense adjustments total (\$36,750) and are comprised of the following:
19		Adjustment 5(a) - ORS proposes a payroll adjustment of (\$42,444). ORS proposes to
20		annualize the latest available salary information as of January 2015. ORS adjusted the
21		payroll based on allocation of all employees' salaries between Midlands Utilities, Inc.
22		("Midlands"), a sister company and DSI. ORS computed annualized salaries of \$139,602,
23		less per book salaries of \$182,046, for an adjustment of (\$42,444).

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Page 5 of 8

Adjustment 5(b) – ORS proposes an adjustment to employee pensions and benefits for adjusted salaries. ORS computed annualized employee pensions and benefits of \$24,127. less per book employee benefits amount of \$34,745, for an adjustment of (\$10,618). Adjustment 5(c) – ORS proposes to remove non-allowable expenses of (\$14,403) from operating expenses. The documents provided in support of these expenses indicated that several of these expenses, such as taxes on vehicles used by both companies, should have been allocated between Midlands and DSI. Other non-allowable expenses included due diligence expenses to discuss a Midlands and DSI merger. There were also several expenses for office painting and repairs, and property taxes that are now covered under the new lease agreement between Midlands and DSI. ORS also removed donations, a sponsorship and charity expenses which are considered non-allowable expenses for ratemaking purposes. Adjustment 5(d) – ORS verified rate case expenses of \$18,956 as of March 31, 2015. These charges included legal fees, administrative expenses, office supplies and consulting fees. ORS proposes to include amortized rate case expenses of \$6,319. This amount represents rate case expenses of \$18,956 amortized over a 3-year period. Adjustment 5(e) – ORS proposes to adjust bad debt expenses by \$14,346. This amount reflects the test period revenue write-off percentage 2.59% applied to ORS's applicable pro forma revenue at present rates. This amount was provided by the ORS Water and Wastewater Department. Adjustment 5(f) – ORS proposes to add expenses of \$450 for Palmetto Utility Protection Service (PUPS). This amount reflects the annual membership fee to PUPS which is

Page 6 of 8

1 required by the South Carolina Underground Facility Damage Prevention Act signed on 2 June 7, 2011. 3 Adjustment 5(g) - ORS proposes to include annual rent of \$9,600 for office space in a 4 building owned by Midlands. ORS found that the proposed rate in the lease agreement 5 between Midlands and DSI is comparable to rates in the Lexington, SC area. 6 Adjustment 6 - ORS proposes to add \$16,959 to depreciation expense. ORS proposes to 7 annualize depreciation expense and adjust for known and measurable plant in service as of March 31, 2015. The details of this adjustment are shown in Audit Exhibit ICG-3. 8 9 ORS updated plant in service to reflect plant additions and retirements since the end of the test year and to reflect certain costs considered non-allowable. Assets without proper 10 11 documentation were removed as part of this adjustment. ORS also allocated a portion of certain assets to Midlands. ORS's total depreciation expense amounted to \$96,918 less 12 13 the per book amount of \$79,959, for a total adjustment of \$16,959. 14 Adjustment 7 – ORS proposes to include property taxes of \$43,107 in accordance with taxes billed by Lexington County. The adjustment of \$39,408 was derived using total 15 taxes of \$43,107 less the per book amount of \$3,699. 16 Adjustment 8 - ORS proposes an adjustment of (\$2,452) to payroll taxes. This amount 17 was calculated on the allocated portions of the salaries and benefits. 18 Adjustment 9 - ORS proposes to add gross receipts and utility/commission taxes 19 associated with adjusted total operating revenue. Using the factor of .009315 and the 20 21 adjusted revenues of \$553,640, ORS calculated the utility/commission taxes of \$5,157 22 less \$3,633 per books for an increase of \$1,524.

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Page 7 of 8

1		Adjustment 10 - ORS proposes to include \$175 for state income taxes after accounting
2		and pro forma adjustments. See Audit Exhibit ICG-4.
3		Adjustment 11 - ORS proposes to include \$1,132 for federal income after accounting and
4		pro forma adjustments. See Audit Exhibit ICG-4.
5		Adjustment 12 - ORS proposes to remove (\$5,666) from interest expense. ORS proposes
6		to synchronize interest expense with DSI's rate base. ORS computed allowable interest
7		expense of \$37,504, less the per book amount of \$43,170, for an adjustment of (\$5,666) to
8		interest on long-term debt.
9		Adjustments 13, 14, and 15 - At proposed increased rates, DSI would produce additional
10		revenues of \$103,128 for Residential Service, \$181,483 for Commercial Service, and
11		\$1,535 for Late Fees. This equates to \$286,146 in additional Operating Revenues for
12		Wastewater Operations. These adjustments were provided by ORS witness Willie Morgan.
13		Adjustment 16 - ORS proposes to add \$7,414 to bad debt expense. This amount reflects
14		the test year revenue write-off percentage of 2.59% applied to the proposed increased
15		revenue. This amount was provided by ORS witness Willie Morgan.
16		Adjustment 17 - Taxes Other Than Income Taxes - ORS proposes to adjust for gross
17		receipts and utility/commission taxes associated with the proposed increase. ORS used a
18		factor of .009315 and the proposed increase of \$286,146, for an adjustment of \$2,666.
19		Adjustment 18 - ORS proposes to adjust for state income taxes associated with the
20		proposed rate increase. The adjustment amounts to \$13,804.
21		Adjustments 19 - ORS proposes to add \$89,169 to federal income tax expenses to adjust
22		taxes associated with the proposed increase. See Audit Exhibit ICG-4.
23	Q.	PLEASE DESCRIBE THE REMAINING AUDIT EXHIBITS.

Page 8 of 8

- 1 A. Audit Exhibit ICG-3 shows ORS's calculation of depreciation expense. Audit
- 2 Exhibit ICG-4 shows ORS's computation of income taxes.
- 3 Q. DOES THIS CONCLUDE YOUR TESTIMONY?
- 4 A. Yes.

Development Service, Inc. Docket Number 2014-406-S Operating Experience & Operating Margin Test Year Ending December 31, 2013 Sewer Operations

		(1) Application		(2) Accounting &			(3) After Accounting &		(4)			(5) After
Description	,	Per Books		Pro Forma Adjustments			Pro Forma Adjustments		Proposed Increase		-	Proposed Increase
Operating Revenues: Residential Commercial Late Fees Miscellaneous Revenue	s	25,374 488,840 0 13,366	S	164,069 (155,674) 2,819 14,846	(1) (2) (3) (4)	\$	189,443 333,166 2,819 28,212	s	103,128 181,483 1,535	(14)	s _	292,571 514,649 4,354 28,212
Total Operating Revenues	S.	527,580	S .	26,060		S	553,640	s _	286,146		\$_	839,786
Utility Operating Expenses: Operating Expenses Depreciation Expense Taxes Other Than Income - Property Taxes Taxes Other Than Income - Payroll Taxes Taxes Other Than Income - Utility Assesment Income Taxes - State Income Tax Income Taxes - Federal Income Tax	s	393,454 79,959 3,699 13,198 3,633 0	s	(36,750) 16,959 39,408 (2,452) 1,524 175 1,132	(6) (7)	S	356,704 96,918 43,107 10,746 5,157 175 1,132	s	7,414 0 0 0 2,666 13,804 89,169	(17) (18)	s _	364,118 96,918 43,107 10,746 7,823 13,979 90,301
Total Utility Operating Expenses	\$.	493,943	\$.	19,996		S.	513,939	s _	113,053		s _	626,992
Total Operating Income	S	33,637	\$	6,064		\$	39,701	S	173,093		\$	212,794
Less: Interest Expense	_	43,170	-	(5,666)	(12)		37,504	_	0		_	37,504
Net Income (Loss) for Margin	S _	(9,533)	\$	11,730		S :	2,197	\$ =	173,093		s ₌	175,290
Operating Margin	=	-1.81%					0.40%				_	20.87%

Development Service, Inc. Docket Number 2014-406-S Explanation of Accounting and Pro Forma Adjustments

Test Year Ending December 31, 2013

ORS Adl.	DSI Adi.		Description	_	Sewer Opera	~
		AD 6 18 1	Sestificion		ORS	DSI
Accoun	Hing a	nd Pro forma Adiustments				
		Oneraling Revenues				
(1)	(I)	Residential	To adjust residential revenue to reflect the pro-forms number of customers at present rates.	s	164,069 \$	(3,448)
(2)	(1)	Commercial	To adjust commercial revenue to reflect the pro-forms number of customers a present rates.	's	(155,674)	24,343
(3)	(I)	Late Fee	To adjust Late Fees to reflect pro forms numbers at present rates.	_	2,819	1,141
(4)	(1)	Miscellaneous Revenue	To adjust miscellaneous revenues to reflect pro-forma numbers at present rates.	s	14,846 \$	0
		Total Operating Revenues		s	26,060 S	22,036
		Utility Operating Expenses				
(5)		Operating Expenses	Q1			
	(3)	5(n) Payroll Adjustment	To annualize salary expenses based on the most recent pay information.	s	(42,444) S	6,372
	(3)	5(b) Employee Benefits	To annualize employee pensions and benefits relative to pro forma salaries.	s	(10,618) \$	0
	(3)	S(c) Nonailowables	To adjust for nonallowable expenses.	s	(14,403) S	0
	(3)	S(d) Rate Case Expenses	To adjust for the 3-year amortization of rate case expenses.	5	6,319 \$	0
	(3)	5(e) Bad Debt Expense	To adjust bad debt expense to reflect test period revenue write-off percentage applied to ORS pro forma revenue at present rates.	s	14,346 \$	14,290
	(3)	5(f) Palmetto Utility Protection Service (PUPS)	To adjust for PUPS expense	s	450 S	2,000
	(3)	5(g) Office Lease	To adjust for office building lease	s	9,600 \$	0
		Total Operating Expenses		s	(36,750) \$	22,662
(6)	(2)	Depreciation Expense	To adjust the annual depreciation for plant in service. See Audit Exhibit ICG - 3.	s	16,959 \$	17,747
(7)		Property Taxes	To adjust property taxes to reflect actual tax bills on verified property owned by \ensuremath{DSI} .	s	39,408 \$	48,283
(8)		Povroll Taxes	To adjust payroll taxes to reflect pro forma wages.	s	(2,452) \$	0
(9)		Taxes and Licenses. Utility Assessment	To adjust for gross receipts and utility assessment.	s	1,524 S	0
(10)		State Income Taxes	To adjust state income taxes associated with ORS's accounting and pro forma adjustments. See Audit Exhibit ICG-4.	s	175 \$	(669)
(11)		Federal Income Taxes	To adjust federal income taxes associated with ORS's accounting and proforma adjustments. See Audit Exhibit ICG-4.	s	1,132 S	(4,323)

Development Service, Inc. Docket Number 2014-406-S Explanation of Accounting and Pro Forma Adjustments Test Year Ending December 31, 2013

ORS	DSI			_	Sewer Opera	lions
<u>Adi.</u>	<u> Adi.</u>		Description		ORS	DSI
(12)		Interest Expense	To adjust the interest expense on long-term debt for accounting and pro forms adjustments.	s	(5,666) \$	(5,513)
Applica	nt's P	ronosed Increase				
(13)		Residential	To adjust sewer service revenues for ORS's recalculation of the Company's proposed increase.	s	103,128 \$	11,939
(14)		Commercial	To adjust sewer service revenues for ORS's recalculation of the Company's proposed increase.	s	181,483 S	280,061
(15)		Late Fees	To adjust for Late fees associated with the Company's proposed increase.	s_	1,535_ S	0
(16)		Bad Debt Expense	To adjust had debt expense to reflect the test period revenue write-off percentage to the Company's proposed increase.	s	7,414 \$	21,882
(17)		Taxes and Licenses, Utility Assessment	To adjust for gross receipts and utility assessment associated with the Company's proposed increase.	s _	2,666 \$	0
(18)		State Income Taxes	To adjust state income taxes associated with the Company's proposed increase. See Audit Exhibit ICG-4	s	13.804 S	10,391
(19)		Federal Income Taxes	To adjust federal income taxes associated with the Company's proposed increase. See Audit Exhibit ICG-4.	s	89,169 \$	67,130

Docket Number 2014-406-S
Computation of Depreciation Expense
Test Year Ending December 31, 2013

May Don't Weller	te Door value	0 (0 (ò	0 (0	7,209	15,263	0	22,472	820	15.006	45,826	105	13.050	804	2,201	16,160	205 656	1004	2,408	337.667		0	2,161	2,161	915.978	4,214	920,192	!	88,434	88,434	22.657	22,657	1,455,569	
Accumulated	١.	2107	DOC"	0 22 66	27,338	5	655	3,685	0	41,068	4.535	44.970	49,505	195	11,418	100	1,469	13,548	380 777	-	741	416,939		0	1,060	1,060	187,001	974	187,975		18,519	18,319	97,343	97,343	825,757	
Prior	7677	1 600	0001	73356	000,12		0	526	0	37,255	4,089	37,475	41,564	175	10,195	402	1,224	11,996	347 209		נונד דר	374,982		Q	899	868	152,478	812	153,290	16 300	13,200	15,266	93,587	93,587	728,839	
Current		9			0	000	650	3,159	0	3,814	9110	7,495	1,941	20	1,223	3	245	1,552	35.012	T.	741	41,956		0	161	161	34,523	162	34,685	1063	cca'c	3,053	3,756	3,756	816'96	
Depreciation Rate 1	 E	2 6	2 6	2 6	2 6	0 110	8.3370	16.67%	16.67%		8.33%	8.33%		6.67%	5.00%	5.00%	6.67%		5.56%	7695 5	2,50%			5.00%	5.00%	•	3.13%	3.13%	1 (7070 L	0,00.7	•	3,13%		i I	
Service Life	E	9	: 6	9 6	2 6	2	4 ,	9	9		21	12		15	20	20	15		90	00	2 00	·	6	70	20		32	32		7	ç		32			
Allocated	7.672	1 500		77 556	0	378 6	COS'	18,948	,	63,541	5,355	89,975	95,330	300	24,468	1,270	3,670	29,708	629,725	2.550	122 330	754,605	'	0	3,221	3,221	1,102,979	5,189	1,108,168	106.362	100,700	106,752	120,000	120,000	2,281,325	
Allocation	33%	100%	100%	100%	%50	750%	8/6/	>0%	25%	'	10%	75%		100%	100%	100%	100%	•	100%	100%	100%	ı		260	100%	'	100%	100%		100%		'	100%	•		
Adjusted Plant in Service	23.249	1 500		27 556	0	10.486	700 55	37,896	0	100,687	53,550	119,967	173,517	300	24,468	1,270	3,670	29,708	629,725	2.550	122 330	754,605	000 24	37,000	3,221	40,221	1,102,979	5,189	1,108,168	106 757	200,000	106,752	120,000	120,000	2,433,658	
ORS	0	0	(879)	0	(6.350)	Ò	•	0	(3,788)	(11.786)	0	0	0	0	(1,647)	0	3,670	2,023	(1,595)	2.550	122.330	123,285			3,221	3,221	(139,493)	5,189	(134,304)	106 752	2000	106,752	0	0	161,68	
DSI Per Application	23,249	1 500	1648	27.556	6,350	10.486	32 806	37,890	3,788	112,473	53,550	119,967	173,517	300	26,115	1,270	0	27,685	631,320	0	0	631,320	27,000	000'/5	0	37,000	1,242,472	0	1,242,472	c		٥	120,000	120,000	2,344,467	
Date in Service	6/15/02	11/01/88	1/31/04	12/30/05	5/01/05	6/19/13	בוונייטו	7147/01	60/10/	•	10/15/03	12/31/07	•	3/01/04	8/31/04	8/05/06	12/17/07	•	1/01/03	8/22/13	11/05/08	1 1	10/15/03	CONCINCT	/0////	•	7/01/08	12/13/07	•	12/27/07		•	1/01/88	'		
Asset	1999 Ford F-150	General Plant - Computer	Computer	2008 Dodge Pickup	Computer & Software	John Deere Mower	2008 Dadge Dam	TOO TOOK WILL	Copier	Total 6-year service life	CAT Backhoe	Kobelco Excavator	Total 12-year service life	Office Desk	Case Generator	Toshiba Generator	Digester / Sludge Project	Total 15-year service life	BR-Equipment Systems	BR Pump	Digester / Sludge Project	Total 18-year service life	CAT Generalor	CAL CARGON	Digester / Studge Project	I otal 20-year service life	BR-Plant/Sewer System	Digester / Sludge Project	Total 32-year service life	Digester / Sludge Project		I otal 33-year service lite	Sewer System - Net	Total 45-year service life	Subtotal	

Depreciation Expense Less: Company per books depreciation Proposed Expense Adjustment

ORS Company 96,918 97,706 79,959 79,959 16,959 17,747

Footnote: BR = Bush River, Merged with DSI in docket No. 2008-69-S

Development Service, Inc. Docket Number 2014-406-S Computation of Income Taxes Test Year Ending December 31, 2013

After Accounting & Pro Forma Adjustments

Description	
Operating Revenues Operating Expenses	\$ 553,640 512.632
Net Operating Income Before Taxes Less: Annualized Interest Expense	41,008 37,504
Taxable Income - State State Income Tax Rate	3,504 5%
State Income Taxes Less: State Income Taxes Per Book	175 0
Adjustment to State Income Taxes - ORS Adjustment (10)	175
Taxable Income - Federal Federal Tax Rate	3,329 34%
Federal Income Taxes Less: Federal Income Taxes Per Book	1,132
Adjustment to Federal Income Taxes - ORS Adjustment (11)	1,132
After Applicant's Proposed Increase Description	
Operating Revenues Operating Expenses	\$ 839,786 522,712
Net Operating Income Before Taxes Less: Annualized Interest Expense	317,074 37,504
Taxable Income - State State Taxable Income	
	279,570 5%
State Income Taxes Less: State Income Taxes As Adjusted	
	13,979
Less: State Income Taxes As Adjusted	13,979 175
Less: State Income Taxes As Adjusted Adjustment to State Income Taxes - ORS Adjustment (18) Taxable Income - Federal	13,979 175 13,804 265,591